

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SYLVESTER ALLEN, JR., DEJUANA  
BIGELOW, TABATHA DAVIS, and  
FUTURE ALAMANCE, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

CITY OF GRAHAM, KRISTI COLE,  
individually and in her official capacity as  
Chief of the Graham Police Department,  
ALAMANCE COUNTY, TERRY S.  
JOHNSON, individually and in his official  
capacity as Sheriff of Alamance County,  
GRAHAM POLICE OFFICERS JOHN and  
JANE DOES #1-15, and ALAMANCE  
COUNTY DEPUTY SHERIFFS JOHN and  
JANE DOES #16-30,

*Defendants.*

Case No. 1:20-cv-00997

**DISCLOSURE OF CORPORATE, AFFILIATIONS AND OTHER  
ENTITIES WITH A DIRECT FINANCIAL INTEREST IN LITIGATION**

Future Alamance, who is a Plaintiff in the above-captioned action,  
makes the following disclosures:

1. Is party a publicly held corporation or other publicly held entity?

( ) Yes (X) No

2. Does party have any parent corporations?

( ) Yes (X) No

If yes, identify all parent corporations, including grandparent and great-grandparent corporations: N/A

3. Is 10% or more of the stock of a party owned by a publicly held corporation or other publicly held entity?

( ) Yes

(X) No

If yes, identify all such owners: N/A

4. Is there any other publicly held corporation or other publicly held entity that has a direct financial interest in the outcome of the litigation?

( ) Yes

(X) No

If yes, identify entity and nature of interest: N/A

Dated November 12, 2020

Respectfully submitted,

/s/ Geraldine Sumter

Geraldine Sumter (NC Bar No. 11107)  
Ferguson Chambers & Sumter, P.A.  
309 East Morehead St., Suite 110,  
Charlotte, NC 28202  
704-375-8461  
GSumter@fergusonsumter.com

C. William Phillips\*  
COVINGTON & BURLING LLP  
620 Eighth Avenue  
New York, NY 10018-1405  
212-841-1081  
cphillips@cov.com

Marianne Spencer\*  
COVINGTON & BURLING LLP  
850 Tenth Street, N.W.  
Washington, DC 20001  
202-662-5745  
mspencer@cov.com

Leah Aden\*  
Natasha Merle\*  
Ashok Chandran\*  
NAACP LEGAL DEFENSE  
AND EDUCATION FUND, INC.  
40 Rector Street, 5th Floor  
New York, NY 10006  
212-965-2200  
laden@naacpldf.org  
nmerle@naacpldf.org  
achandran@naacpldf.org

Morgan Lewis\*  
COVINGTON & BURLING LLP  
415 Mission Street  
San Francisco, CA 94105-2533  
415-591-7098  
mlewis@cov.com

*Attorneys for Plaintiffs*

\* Application for appearance pursuant to Local Rule 83.1(d) forthcoming

## CERTIFICATE OF SERVICE

I, Geraldine Sumter, hereby certify that on the 12th day of November, 2020, a true and correct copy of the foregoing was filed on the Court's CM/ECF filing system. An additional copy was mailed to the following defendants, via certified mail with return receipt:

City of Graham  
Graham City Attorney's Office  
201 South Main Street  
Graham, NC 27253

Chief Kristi Cole  
Graham Police Department  
216 S. Maple St.  
Graham, NC 27253

Sheriff Terry S. Johnson  
Alamance County Sheriff's Office  
109 S. Maple St.  
Graham NC 27253

Alamance County  
Alamance County Attorney's Office  
124 W. Elm St.  
Graham, NC 27253.

/s/ Geraldine Sumter

Geraldine Sumter